

RECITALS

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2 1. On May 4, 2023 Creditor filed a motion for relief from the automatic stay
3 (“Motion”), inter alia, to permit it to proceed regarding a default as to real property
4 secured by a recorded deed of trust, owned by the Debtor, located at 25641 Byron Street,
5 San Bernardino CA 92404, Assessor’s Parcel No. 0273-353-01-0-000 (The “Property”).
6 proceed to judgment in the state court on a pre-petition state law lawsuit against the
7 Debtor. ECF #131.

8 2. The Motion is presently set for hearing on May 31, 2023. ECF #132.

9 3. The last date for the Debtor to oppose the Motion is May 17, 2023.

10 4. The Parties have met and conferred in an effort to resolve the disputes
11 between and amount themselves. As a result of those efforts, the Parties have agreed in
12 this Stipulation to request that the hearing on the Motion be continued to a date beyond
13 the hearing presently set for the Debtor’s motion for approval of disclosure statement,
14 which is presently set for July 19, 2023 at 1:30 p.m.. ECF #141. In addition, the Parties
15 have agreed to extent the deadlines for the Debtor to oppose the Motion, and for the
16 Creditor to Reply, as set forth herein.

17 As a result, the Parties hereby agree and stipulate as follows:

STIPULATION

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19 1. The above recitals are hereby incorporated into this Stipulation.

20 2. The Parties agree that the hearing on the Motion may be continued to
21 August 16, 2023, at 1:30 p.m.

22 3. In addition, the deadline for the Debtor to oppose the Motion is hereby
23 extended to August 2, 2023.

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1 4. In addition, the deadline for the Creditor to reply to any opposition to the
2 Motion is hereby extended to August 9, 2023.

3 IT IS SO STIPULATED.

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5 Dated: May 16, 2023

SULLIVAN HILL REZ & ENGEL
A Professional Law Corporation

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7 By: /s/Gary B. Rudolph
8 Gary B. Rudolph
9 Kathleen A. Cashman-Kramer
Attorneys for Creditor Lantzman
Investments, Inc.

10 IT IS SO STIPULATED.

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12 Dated: May 15, 2023

FINANCIAL RELIEF LAW CENTER, APC

13 By: /s/ [Signature]
14 Andy C. Warshaw, Esq.
15 Attorneys for Debtor 2nd Chance
16 Investments, LLC
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

600 B Street, Suite 1700
San Diego, CA 92101

A true and correct copy of the foregoing document entitled (*specify*): Stipulation regarding Continuing Hearing Motion

~~for Relief from the Automatic Stay filed by Lantzman Investments, Inc.~~

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 05/16/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached.

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 05/16/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See attached.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/16/2023 Laurel Dinkins
Date *Printed Name*

/s/ Laurel Dinkins
Signature

SERVICE INFORMATION

Case No. 8:22-bk-12142 –

2nd Chance Investment Group, LLC

1. To be served by the Court via Notice of Electronic Filing [NEF]:

- **Amanda G. Billyard** abillyard@bwlawcenter.com
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2. Served by United States Mail:

Judge – Courtesy Copy	Honorable Scott C. Clarkson United States Bankruptcy Court Central District of California Ronald Reagan Federal Building and Courthouse 411 West Fourth Street, Suite 5130 / Courtroom 5C Santa Ana, CA 92701-4593
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